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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARKISHA KENYA HUTSON,

and

JOHN WESLEY ROBINSON III,
 a.k.a. "Wesdog,"

Defendants.

CRIMINAL INDICTMENT

Case No. 2:24-cr- *0073-GMN-MDC*

VIOLATIONS:

Counts One and Two: 18 U.S.C.
 §§ 922(a)(6) and 924(a)(2) – Illegal
 Acquisition of a Firearm

Counts Three and Four: 18 U.S.C.
 §§ 922(g)(1) and 924(a)(8) – Possession of
 Firearms by Prohibited Person (Prior
 Felony)

Count Five: 18 U.S.C. § 932(b)(1) –
 Straw Purchasing of Firearms

Count Six: 18 U.S.C. § 933(a)(1) –
 Trafficking in Firearms

Count Seven: 18 U.S.C. § 933(a)(2) –
 Trafficking in Firearms

THE GRAND JURY CHARGES THAT:

COUNT ONE

Illegal Acquisition of a Firearm
18 U.S.C. §§ 922(a)(6) and 924(a)(2)

Between on or about March 1, 2024, and March 7, 2024, in the State and Federal
District of Nevada,

MARKISHA KENYA HUTSON,

defendant herein, in connection with the acquisition of firearms, specifically:

1. a Century Arms, Inc. model VSKA 7.62x39mm semiautomatic rifle bearing
serial number SV7147682; and

2. a Glock model G-20 SF 10mm Auto semiautomatic pistol bearing serial
number CAKD141,

from Distinctive Defense Strategy LLC, a licensed dealer of firearms within the meaning of
Chapter 44 of Title 18, United States Code, knowingly made and caused to be made a false
and fictitious written statement to Distinctive Defense Strategy LLC, which statement was
intended and likely to deceive Distinctive Defense Strategy LLC, as to a fact material to the
lawfulness of such sale of said firearms to the defendant under Chapter 44 of Title 18,
United States Code, in that HUTSON did complete and execute a Bureau of Alcohol,
Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein
HUTSON represented that she was the actual transferee/buyer of the firearm listed on the
form, when in fact, and as HUTSON well knew, she was acquiring the firearms on behalf of
other persons, and that her current residence was 3809 Valley Forge Avenue, Las Vegas,
NV 89110, when in fact, and as HUTSON well knew, she did not reside at that address; all
in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

Illegal Acquisition of a Firearm
18 U.S.C. §§ 922(a)(6) and 924(a)(2)

On or about March 21, 2024, in the State and Federal District of Nevada,

MARKISHA KENYA HUTSON,

defendant herein, in connection with the acquisition of firearms, specifically:

1. a Del-Ton, Inc. model DTI-15 5.56x45mm semiautomatic rifle bearing serial number DTI-S291087;

2. a Glock model G-27 .40 S&W semiautomatic pistol bearing serial number CBTK945;

3. a Glock model G-31 .357 SIG semiautomatic pistol bearing serial number BZVL474;

4. a Taurus Armas / Taurus USA model G2C .40 S&W semiautomatic pistol bearing serial number AEE464247; and

5. a Taurus Armas / Taurus USA model G2C .40 S&W semiautomatic pistol bearing serial number AEL832774,

from Distinctive Defense Strategy LLC, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, knowingly made and caused to be made a false and fictitious written statement to Distinctive Defense Strategy LLC, which statement was intended and likely to deceive Distinctive Defense Strategy LLC, as to a fact material to the lawfulness of such sale of said firearms to the defendant under Chapter 44 of Title 18, United States Code, in that HUTSON did complete and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 Firearms Transaction Record, wherein HUTSON represented that she was the actual transferee/buyer of the firearm listed on the form, when in fact, and as HUTSON well knew, she was acquiring the firearms on behalf of

1 other persons, and that her current residence was 3809 Valley Forge Avenue, Las Vegas,
 2 NV 89110, when in fact, and as HUTSON well knew, she did not reside at that address; all
 3 in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

4 **COUNT THREE**

5 *Possession of a Firearm by a Prohibited Person (Prior Felony)*
 6 18 U.S.C. §§ 922(g)(1) and 924(a)(8)

7 On or about March 7, 2024, in the State and Federal District of Nevada,

8 **JOHN WESLEY ROBINSON III,**
 9 **a.k.a. "Wesdog,"**

10 defendant herein, knowing he had previously been convicted of a crime punishable by
 11 imprisonment for a term exceeding one year, that is: Accessory to Murder (PC 187(a) and
 12 32) in the Superior Court of California, County of Los Angeles, in Case No. GA101244-06
 13 on or about July 23, 2018; Felony Reckless Evading (VC 2800.2) in the Superior Court of
 14 California, County of Los Angeles, in Case No. GA016124 on or about March 1, 1994;
 15 Transport or Sell Controlled Substances (Cocaine) (HS 11352(a)) in the Superior Court of
 16 California, County of Los Angeles, in Case No. GA009028 on or about January 28, 1992;
 17 Robbery Second (PC 211) in the Superior Court of California, County of Los Angeles, in
 18 Case No. GA001256 on or about October 7, 1989; Robbery Second (PC 211) in the
 19 Superior Court of California, County of Los Angeles, in Case No. KA000142 on or about
 20 January 8, 1990; and Possess or Purchase Cocaine Base for Sale (HS 11351.5) in the
 21 Superior Court of California, County of Los Angeles, in Case No. KA000129 on or about
 22 November 29, 1989, knowingly possessed firearms, that is:

- 23 1. a Century Arms, Inc. model VSKA 7.62x39mm semiautomatic rifle bearing
 24 serial number SV7147682; and

1 1991; Robbery Second (PC 211) in the Superior Court of California, County of Los
2 Angeles, in Case No. GA001256 on or about October 7, 1989; Robbery Second (PC 211) in
3 the Superior Court of California, County of Los Angeles, in Case No. KA000142 on or
4 about July 13, 1989; and Possess or Purchase Cocaine Base for Sale (HS 11351.5) in the
5 Superior Court of California, County of Los Angeles, in Case No. KA000129 on or about
6 June 2, 1989, knowingly possessed firearms, that is:

7 1. a Del-Ton, Inc. model DTI-15 5.56x45mm semiautomatic rifle bearing serial
8 number DTI-S291087;

9 2. a Glock model G-27 .40 S&W semiautomatic pistol bearing serial number
10 CBTK945;

11 3. a Glock model G-31 .357 SIG semiautomatic pistol bearing serial number
12 BZVL474;

13 4. a Taurus Armas / Taurus USA model G2C 9x19mm semiautomatic pistol
14 bearing serial number AEE464247;

15 5. a Taurus Armas / Taurus USA model G2C .40 S&W semiautomatic pistol
16 bearing serial number AEL832774; and

17 6. a Sturm, Ruger & Co. model SP101 .357 Magnum revolver bearing serial
18 number 574-22352,

19 said possession being in and affecting interstate commerce and said firearms having been
20 shipped and transported in interstate commerce, all in violation of Title 18, United States
21 Code, Sections 922(g)(1) and 924(a)(8).

COUNT FIVE

Straw Purchasing of Firearms

18 U.S.C. § 932(b)(1)

Between on or about March 1, 2024, and on or about March 21, 2024, in the State and Federal District of Nevada,

MARKISHA KENYA HUTSON,

defendant herein, did knowingly purchase firearms, to wit:

1. a Century Arms, Inc. model VSKA 7.62x39mm semiautomatic rifle bearing serial number SV7147682;

2. a Glock model G-20 SF 10mm Auto semiautomatic pistol bearing serial number CAKD141;

3. Del-Ton, Inc. model DTI-15 5.56x45mm semiautomatic rifle bearing serial number DTI-S291087;

4. a Glock model G-27 .40 S&W semiautomatic pistol bearing serial number CBTk945;

5. a Glock model G-31 .357 SIG semiautomatic pistol bearing serial number BZVL474;

6. a Taurus Armas / Taurus USA model G2C 9x19mm semiautomatic pistol bearing serial number AEE464247; and

7. a Taurus Armas / Taurus USA model G2C .40 S&W semiautomatic pistol bearing serial number AEL832774,

in or otherwise affecting interstate or foreign commerce for, on behalf of, or at the request or demand of JOHN WESLEY ROBINSON, knowing or having reasonable cause to believe that JOHN WESLEY ROBINSON had previously been convicted in any court of,

1 a crime punishable by imprisonment for a term exceeding one year; or did conspire to do
2 so, in violation of Title 18, United States Code, Section 932(b)(1).

3 **COUNT SIX**
4 *Trafficking in Firearms*
5 18 U.S.C. § 933(a)(1)

6 Between on or about March 1, 2024, and on or about March 21, 2024, in the State
7 and Federal District of Nevada,

8 **MARKISHA KENYA HUTSON,**

9 Defendant herein, did ship, transport, transfer, cause to be transported, or otherwise dispose
10 of firearms, that is:

11 1. a Century Arms, Inc. model VSKA 7.62x39mm semiautomatic rifle bearing
12 serial number SV7147682;

13 2. a Glock model G-20 SF 10mm Auto semiautomatic pistol bearing serial
14 number CAKD141;

15 3. Del-Ton, Inc. model DTI-15 5.56x45mm semiautomatic rifle bearing serial
16 number DTI-S291087;

17 4. a Glock model G-27 .40 S&W semiautomatic pistol bearing serial number
18 CBTk945;

19 5. a Glock model G-31 .357 SIG semiautomatic pistol bearing serial number
20 BZVL474;

21 6. a Taurus Armas / Taurus USA model G2C 9x19mm semiautomatic pistol
22 bearing serial number AEE464247; and

23 7. a Taurus Armas / Taurus USA model G2C .40 S&W semiautomatic pistol
24 bearing serial number AEL832774,

1 to JOHN WESLEY ROBINSON in or otherwise affecting commerce, knowing or having
2 reasonable cause to believe that the use, carrying, or possession of the firearm by JOHN
3 WESLEY ROBINSON would constitute a felony, or did attempt or conspire to do so, in
4 violation of Title 18, United States Code, Section 933(a)(1).

5 **COUNT SEVEN**
6 *Trafficking in Firearms*
7 18 U.S.C. § 933(a)(2)

8 Between on or about March 1, 2024, and on or about March 21, 2024, in the State
9 and Federal District of Nevada,

10 **JOHN WESLEY ROBINSON III,**
11 **a.k.a. "Wesdog,"**

12 defendant herein, did receive from another person, in or otherwise affecting interstate or
13 foreign commerce, firearms, that is:

14 1. a Century Arms, Inc. model VSKA 7.62x39mm semiautomatic rifle bearing
15 serial number SV7147682;

16 2. a Glock model G-20 SF 10mm Auto semiautomatic pistol bearing serial
17 number CAKD141;

18 3. Del-Ton, Inc. model DTI-15 5.56x45mm semiautomatic rifle bearing serial
19 number DTI-S291087;

20 4. a Glock model G-27 .40 S&W semiautomatic pistol bearing serial number
21 CBTK945;

22 5. a Glock model G-31 .357 SIG semiautomatic pistol bearing serial number
23 BZVL474;

24 6. a Taurus Armas / Taurus USA model G2C 9x19mm semiautomatic pistol
bearing serial number AEE464247; and

7. a Taurus Armas / Taurus USA model G2C .40 S&W semiautomatic pistol bearing serial number AEL832774, knowing or having reasonable cause to believe that such receipt would constitute a felony, or did attempt or conspire to do so, in violation of Title 18, United States Code, Section 933(a)(2).

FORFEITURE ALLEGATION ONE

*Illegal Acquisition of a Firearm, Possession of a Firearm by a Prohibited Person (Prior Felony),
Straw Purchasing of Firearms, and Trafficking in Firearms*

1. The allegations of Counts Two and Four through Seven of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture under 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts Two and Four through Seven of this Criminal Indictment,

**MARKISHA KENYA HUTSON, and
JOHN WESLEY ROBINSON III,
a.k.a. "Wesdog,"**

defendants herein, shall forfeit to the United States of America, any firearm or ammunition involved in or used in any knowing violation of 18 U.S.C. §§ 922(a)(6), 922(g)(1), 932(b)(1), 933(a)(1), and 933(a)(2):

For Counts Two and Five through Seven:

1. a Del-Ton, Inc. model DTI-15 5.56x45mm semiautomatic rifle bearing serial number DTI-S291087;
2. a Glock model G-27 .40 S&W semiautomatic pistol bearing serial number CBTk945;
3. a Glock model G-31 .357 SIG semiautomatic pistol bearing serial number BZVL474;

4. a Taurus Armas / Taurus USA model G2C 9x19mm semiautomatic pistol bearing serial number AEE464247;
5. a Taurus Armas / Taurus USA model G2C .40 S&W semiautomatic pistol bearing serial number AEL832774; and
6. any and all compatible ammunition.

For Count Four:

1. items one through six above and
2. a Sturm, Ruger & Co. model SP101 .357 Magnum revolver bearing serial number 574-22352.

All under 18 U.S.C. §§ 922(a)(6), 922(g)(1), 932(b)(1), 933(a)(1), and 933(a)(2) and 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c).

FORFEITURE ALLEGATION TWO

*Straw Purchasing of Firearms and
Trafficking in Firearms*

1. The allegations of Counts Five through Seven of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture under 18 U.S.C. § 924(d)(1), (2)(C), and (3)(G) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts Five through Seven of this Criminal Indictment,

**MARKISHA KENYA HUTSON, and
JOHN WESLEY ROBINSON III,
a.k.a. "Wesdog,"**

defendants herein, shall forfeit to the United States of America, any firearm or ammunition intended to be used in violation of 18 U.S.C. §§ 932(b)(1), 933(a)(1), and 933(a)(2):

1. a Del-Ton, Inc. model DTI-15 5.56x45mm semiautomatic rifle bearing serial number DTI-S291087;

2. a Glock model G-27 .40 S&W semiautomatic pistol bearing serial number
CBTK945;

3. a Glock model G-31 .357 SIG semiautomatic pistol bearing serial number
BZVL474;

4. a Taurus Armas / Taurus USA model G2C 9x19mm semiautomatic pistol
bearing serial number AEE464247;

5. a Taurus Armas / Taurus USA model G2C .40 S&W semiautomatic pistol
bearing serial number AEL832774; and

6. any and all compatible ammunition.

All under 18 U.S.C. §§ 932(b)(1), 933(a)(1), and 933(a)(2) and 18 U.S.C. § 924(d)(1),
(2)(C), and (3)(G) with 28 U.S.C. § 2461(c).

DATED: this 9th day of April, 2024.

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

JASON M. FRIERSON
United States Attorney



DANIEL J. COWHIG
Assistant United States Attorney